

Appl. No. 09/328,667

Attorney Docket No.: 113394

**REMARKS**

Claims 1-5, 7-15, 17-25 and 27-30 remain pending in this application.

The final office action appears to have repeated verbatim the rejection set forth in the Office action of 07/24/2003.

That rejection had advanced the view that it would have been obvious to modify Galasso to put the US master gatekeeper and a zone gatekeeper at the same hierarchical level. (Office action of 07/24/2003 page 3, lines 8-12.) Applicant had responded to that office action in a "Response To Office Action" dated 10/17/2003 pointing out why that modification would not have been obvious.

The most recent, final Office action counters applicant's arguments by pointing to a statement in Galasso at col. 3, lines 52-53, indicating that in an embodiment of Galasso, "a master gatekeeper queries another master gatekeeper to resolve an address." (Final Office action, page 5.)

The rejection is again respectfully traversed, for at least two reasons.

Firstly, the Office action has not advanced any reason why applicant was incorrect in arguing that it would not have been obvious to put a master gatekeeper and a zone gatekeeper at the same hierarchical level. Thus applicant respectfully renews those arguments.

Secondly, it would appear that the Office action, in citing the passage at col. 3, lines 52-53 of Galasso, is advancing a different theory of how Galasso anticipates applicant's claims. In particular, as noted above, the original rejection was based on the theory that it would have been obvious to put the master gatekeeper and zone gatekeeper at the same hierarchical level, thereby allegedly anticipating the recitation in, for example, claim 1 that the "first" and "third" gatekeepers are at the same hierarchical level.

It now appears, however, that in citing col. 3, lines 52-53 of Galasso, the Office action is pointing to two master gatekeepers as corresponding to applicant's recited "first" and "third" gatekeepers.

Appl. No. 09/328,667

Attorney Docket No.: 113394

It is respectfully pointed out that the cited passage in Galasso stating that “a master gatekeeper queries another master gatekeeper to resolve an address” is clearly referring to the possibility that one master gatekeeper in one domain, such as US gatekeeper 550 in the US administrative domain (hereinafter “US domain”), can query another master gatekeeper in another domain, such as Europe gatekeeper 560 in the Europe administrative domain (hereinafter “Europe domain”). Applicant agrees with the examiner that Galasso’s US and Europe master gatekeepers are at the same hierarchical level. However, this fact in isolation does not mean that applicant’s claims can be said to read on Galasso.

In particular, applicant’s claims were rejected based on the theory that Galasso’s Europe gatekeeper 560 corresponds to applicants recited second gatekeeper, not to applicant’s recited third gatekeeper, as the Office action now seems to be implying. Thus if one of Galasso’s master gatekeepers 550 and 560 is going to be said to correspond to applicant’s recited “third” gatekeeper, then what in Galasso is going to correspond to the “second” gatekeeper?

It is also noted that applicant’s claims recite that the first and third gatekeepers are “in a same domain.” By contrast, the two master gatekeepers in Galasso are in different domains—namely the US domain and the Europe domain.

In order for Galasso to anticipate applicant’s claims, there would have to be some teaching in Galasso that would show, or render obvious, the provision of another master gatekeeper within (say) the US domain at the same hierarchical level, with that other master gatekeeper making queries of master gatekeeper 550 (as is the case, for example, with applicant’s gatekeepers 420a and 420b shown in FIG. 4). However, there is no such showing in Galasso. Nor is there any basis on which to assert that it would be obvious. In particular, the mere fact that Galasso discloses two gatekeepers at the same hierarchical level but in different domains that make requests of one another through an intermediate gatekeeper does not render obvious the inclusion of two gatekeepers at the same hierarchical level and within the same domain making requests of one another. Indeed, such an approach runs counter to the strictly hierarchical architecture that lies at the heart of Galasso’s disclosure.

Appl. No. 09/328,667

Attorney Docket No.: 113394

To repeat what is stated above, the passage at col. 3, lines 52-53 of Galasso is clearly referring to Galasso's two master gatekeepers 550 and 560, which are in different domains. Thus Galasso's two master gatekeepers cannot be said to correspond to applicant's recited first and third gatekeepers because the claims require the first and third gatekeepers to be in the same domain. Nor is there any basis to assert that it would be obvious, based on Galasso's teaching of a strictly hierarchical architecture, to provide two or more gatekeepers within a particular domain that query each other.

Moreover, any assertion based on col. 3, lines 52-53 of Galasso that the two master gatekeepers in Galasso correspond to applicant's recited first and third gatekeepers is inconsistent with the rejection itself because, as applicant understands the rejection, it is based on a reading that makes Galasso's master gatekeepers correspond to applicant's first and second gatekeepers, not applicant's first and third gatekeepers.

Reconsideration is requested.

Respectfully,  
Radhika R. Roy

By: 

Ronald D. Slusky  
Attorney for Applicant  
Reg. No. 26,585  
(732) 249-0900

Law Office of Ronald D. Slusky  
P.O. Box 4378  
Highland Park, New Jersey 08904-4378  
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